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*Attorneys for Lead Plaintiff Richard Worley  
and the Proposed Settlement Class*

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

COURTNEY ELKIN, Individually and on  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

WALTER INVESTMENT MANAGEMENT  
CORP., GEORGE M. AWAD, ANTHONY  
N. RENZI, and GARY L. TILLET,

Defendants.

Case No.: 2:17-cv-02025-JCJ

**DECLARATION OF LEE ALBERT IN  
SUPPORT OF LEAD PLAINTIFF'S  
UNCONTESTED MOTION FOR  
PRELIMINARY APPROVAL OF  
SETTLEMENT**

I, Lee Albert, hereby declare:

1. I am an attorney admitted to practice before this Court. I am a partner at the law firm of Glancy Prongay & Murray LLP, Lead Counsel for Lead Plaintiff and the proposed Settlement Class in this action. I have personal knowledge of the facts set forth herein, and if called upon to testify, I could and would do so truthfully and accurately. I submit this Declaration, together with the attached exhibits, in further support of Lead Plaintiff's Uncontested Motion for Preliminary Approval of Settlement and Approval of Notice to the Settlement Class.

2. Attached hereto as Exhibit 1 is a true and correct copy of Stefan Boettrich & Svetlana Starykh, *Recent Trends in Securities Class Action Litigation: 2017 Full-Year Review: Record Number of Cases Filed, Led by Growth in Merger Objections, Highest Number of Dismissals in the Shortest Amount of Time* (January 2017).

3. Attached hereto as Exhibit 2 is a true and correct copy of the Stipulation and Agreement of Settlement. Attached as exhibits to the Stipulation and Agreement of Settlement are:

Exhibit A: [Proposed] Order Preliminarily Approving Settlement and Providing for Notice;

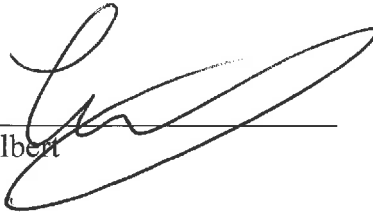
Exhibit A-1: Notice of (I) Pendency of Class Action, Certification of Settlement Class, and Proposed Settlement; (II) Settlement Fairness Hearing; and (III) Motion for an Award of Attorneys' Fees and Litigation Expenses;

Exhibit A-2: Proof of Claim and Release Form;

Exhibit A-3: Summary Notice of (I) Pendency of Class Action, Certification of Settlement Class, and Proposed Settlement; (II) Settlement Fairness Hearing; and (III) Motion for an Award of Attorneys' Fees and Litigation Expenses; and

Exhibit B: [Proposed] Judgment and Order Approving Class Action Settlement.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on July 13, 2018, at New York, New York.

  
\_\_\_\_\_  
Lee Albert

**PROOF OF SERVICE**

I, the undersigned say:

I am not a party to the above case and am over eighteen years old.

On July 13, 2018, I served true and correct copies of the foregoing document, by posting the document electronically to the ECF website of the United States District Court for the Eastern District of Pennsylvania, for receipt electronically by the parties listed on the Court's Service List.

I affirm under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on July 13, 2018.

*s/ Lee Albert*  
Lee Albert

## **Mailing Information for a Case 2:17-cv-02025-JCJ ELKIN v. WALTER INVESTMENT MANAGEMENT CORP. et al**

### **Electronic Mail Notice List**

The following are those who are currently on the list to receive e-mail notices for this case.

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## Manual Notice List

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- (No manual recipients)